

Gregson, Ashley

From: Gregson, Ashley
Sent: Wednesday, September 14, 2016 5:21 PM
To: 'Lisa A. Marcy'
Cc: jkjohnson1080@hotmail.com; Hamilton, R. Blake; Jennifer Hunter; Michelle Carter
Subject: RE: Chatwin v. Draper, et al. - Reply in Support of Motion for Partial Summary Judgment

Thank you, Lisa. We will plan to file on October 3rd.

Ashley

From: Lisa A. Marcy [mailto:LMarcy@clydesnow.com]
Sent: Wednesday, September 14, 2016 4:45 PM
To: Gregson, Ashley <AGregson@djplaw.com>
Cc: jkjohnson1080@hotmail.com; Hamilton, R. Blake <BHamilton@djplaw.com>; Jennifer Hunter <JHunter@clydesnow.com>; Michelle Carter <MCarter@clydesnow.com>
Subject: RE: Chatwin v. Draper, et al. - Reply in Support of Motion for Partial Summary Judgment

Ashley,

Yes, my concern is now obviated.

Lisa

From: Gregson, Ashley [mailto:AGregson@djplaw.com]
Sent: Wednesday, September 14, 2016 4:43 PM
To: Lisa A. Marcy <LMarcy@clydesnow.com>
Cc: jkjohnson1080@hotmail.com; Hamilton, R. Blake <BHamilton@djplaw.com>; Jennifer Hunter <JHunter@clydesnow.com>; Michelle Carter <MCarter@clydesnow.com>
Subject: RE: Chatwin v. Draper, et al. - Reply in Support of Motion for Partial Summary Judgment

Lisa,

I haven't received a response to my below email from yesterday. Since the Court has now set oral argument on our summary judgment motion in November, will you grant us the two week extension to October 3rd?

Thanks,

Ashley

From: Gregson, Ashley
Sent: Tuesday, September 13, 2016 1:46 PM
To: 'Lisa A. Marcy' <LMarcy@clydesnow.com>
Cc: jkjohnson1080@hotmail.com; Hamilton, R. Blake <BHamilton@djplaw.com>; Jennifer Hunter <JHunter@clydesnow.com>; Michelle Carter <MCarter@clydesnow.com>
Subject: RE: Chatwin v. Draper, et al. - Reply in Support of Motion for Partial Summary Judgment

Lisa,

I appreciate that you are trying to be accommodating. Our deadline is currently set for Monday, September 19th, so I was requesting two additional weeks. While an extension to the 26th (one additional week) would be helpful, two weeks are truly needed considering the lengthy opposition (nearly 800 pages with exhibits), which includes 52 additional disputed facts to which we will have to respond. If you were expecting oral argument next month, I think the chances of that happening were slim even with no changes to the briefing schedule simply because I know our calendar is also quite full.

Let me know if you are willing to reconsider and give us two weeks.

Thanks,

Ashley

From: Lisa A. Marcy [<mailto:LMarcy@clydesnow.com>]
Sent: Tuesday, September 13, 2016 10:35 AM
To: Gregson, Ashley <AGregson@djplaw.com>
Cc: jkjohnson1080@hotmail.com; Hamilton, R. Blake <BHamilton@djplaw.com>; Jennifer Hunter <JHunter@clydesnow.com>; Michelle Carter <MCarter@clydesnow.com>
Subject: RE: Chatwin v. Draper, et al. - Reply in Support of Motion for Partial Summary Judgment

Ashley,

I want to be as accommodating as possible; however, I am concerned that much time will extend the date for oral argument and may throw off the limine and pretrial dates-the judge will likely not accelerate his decision on the msj, and the timeline is already tight. My schedule from mid-November to mid-December is really packed, so I can agree to Sept 26, That is an extra 11 days.

Lisa



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From: Gregson, Ashley [<mailto:AGregson@djplaw.com>]
Sent: Tuesday, September 13, 2016 9:55 AM
To: Lisa A. Marcy <LMarcy@clydesnow.com>
Cc: jkjohnson1080@hotmail.com; Hamilton, R. Blake <BHamilton@djplaw.com>
Subject: Chatwin v. Draper, et al. - Reply in Support of Motion for Partial Summary Judgment

Lisa,

Blake will be out of town in depositions for most of the month of September, so we could use some additional time to prepare our reply memorandum. Would you be willing to stipulate to extend our deadline to Monday, October 3rd?

Thanks,

Ashley

Ashley Gregson | Attorney at Law

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